

**\*\*DELIBERATIVE\*\***

Ameren Labadie 1-Hour SO<sub>2</sub> Designation Talking Points (6/30/16)

- The EPA received numerous modeling analyses, including analyses from the state of Missouri, the Sierra Club, and Ameren, to assist us in making the final designation but all analyses were not representative of actual operating conditions and therefore were insufficient to enable EPA to determine whether the area meets or does not meet the 1-hour SO<sub>2</sub> NAAQS. ***(If we want to get into this level of detail)*** Specifically:
  - The state of Missouri used a fixed stack exit velocity that does not appear to be representative of the actual, historical exit velocities.
  - Ameren's modeling analyses that used 2013-2015 emission data contained an error in the surface characteristic calculations.
  - The Sierra Club's modeling contained an error in the merged plume exit velocity calculations for units 3 and 4.
- EPA considered the recent monitoring conducted by Ameren but could not determine whether the area was or was not meeting the NAAQS based on this monitoring since the monitor has not collected data for at least a three year period.
  - ***(I'm not sure that we want to get into this level of detail although we did in the RTC)***  
Based on an analysis of the historic and new on-site meteorological data, it appears that these new monitors may not be placed in an area where the maximum concentrations are expected to occur.
- EPA considered the historic monitoring at the Valley and Northwest sites that was conducted in the late 1980's and early 1990's. EPA could not determine whether the area meets or does not meet the NAAQS based on this monitoring information since the time period of the monitoring was approximately 20 years ago.
  - ***(I'm not sure if we want to get into this level of detail although we did in the RTC)***  
Ameren asserts that data from the historic monitors support an attainment designation since the monitors either showed compliance with the standard or were just above the standard and the emissions (on a ton per year basis) have dramatically decreased since that period.
  - ***(I'm not sure if we want to get into this level of detail although we did in the RTC)***  
However, EPA evaluated the historic monitoring and determined that, although the ton per year emissions have decreased since that time period, the average hourly emission rates are still at a level that could result in a monitored value greater than 75 ppb.